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20 UNITED STATES DISTRICT COURT  
21 NORTHERN DISTRICT OF CALIFORNIA  
22 OAKLAND DIVISION

23 THOMAS RAY WOODSON,  
24 Plaintiff,  
25 v.

26 J. RODRIGUEZ, *et al.*,  
27 Defendants.

Case No. 4:07-CV-04925-CW

**STIPULATION AND [PROPOSED]  
ORDER EXTENDING DISCOVERY  
CUT-OFF FOR EXPERT  
WITNESSES**

Judge: The Honorable Claudia Wilken

Complaint Filed: September 21, 2007  
Trial Date: June 27, 2011

Pursuant to Northern District Local Rules 7-12 and 16-2, counsel for Plaintiff Thomas R. Woodson and counsel for Defendants J. Rodriguez, E. Camarena, J. Parra, D. Vega, and Sergeant Kircher hereby submit this Stipulation and Proposed Order to extend the deadline to depose David Tristan.

The Parties previously agreed to extend the case management dates, as set forth in the stipulated order adopted by this Court on January 14, 2011, February 1, 2011, and February 15, 2011 (Dkt. 107, 109, & 111);

On February 15, 2011, the deadline to disclose a rebuttal use of force expert and expert report was extended to Friday, February 18, 2011;

On February 18, 2011, Defendants disclosed David Tristan as their rebuttal use of force expert and disclosed Mr. Tristan's expert report;

On March 2, 2011, Plaintiff noticed Tristan's deposition for March 4, 2011, the current discovery cut-off for use-of-force experts;

Tristan objected to the deposition notice on various grounds;

On March 3, 2011, the parties met and conferred about Tristan's anticipated deposition and agreed to extend discovery to allow Plaintiff to depose Tristan.

IT IS HEREBY STIPULATED AND AGREED by the Parties, by and through their respective counsel, that:

1. The deadline to depose Mr. Tristan is extended to March 17, 2011.

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3 Dated: March 4, 2011  
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Respectfully Submitted,

MATTHEW I. KREEGER  
DANIEL P. MUINO  
J. MANENA BISHOP  
JANELLE J. SAHOURIA  
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MORRISON & FOERSTER LLP

7 By: /s/ Joe Kanada

8 JOE KANADA

9 Attorneys for Plaintiff  
THOMAS RAY WOODSON  
10

11 Dated: March 4, 2011  
12  
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NEAH HUYNH  
CALIFORNIA ATTORNEY GENERAL'S  
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14 By: /s/ Neah Huynh

15 NEAH HUYNH

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**ECF ATTESTATION**

I, JOE KANADA, am the ECF User whose ID and password are being used to file the following document: STIPULATION AND [PROPOSED] ORDER EXTENDING DISCOVERY CUT-OFF FOR EXPERT WITNESSES. In compliance with General Order 45, X.B., I hereby attest that Neah Huynh has concurred in this filing.

Dated: March 4, 2011

**JOE KANADA  
MORRISON & FOERSTER LLP**

By: /s/ Joe Kanada  
JOE KANADA

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2 **PURSUANT TO THE PARTIES' STIPULATION, IT IS SO ORDERED.**  
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4 Dated: 3/10/2011

  
HONORABLE CLAUDIA WILKEN  
United States District Court Judge